



July 20, 2015

Department of Ecology
Attn: Ms. Carrie Graul, Water Quality Program
P.O. Box 47600
Olympia, Washington 98504-7600

RE: July 2015 Concrete Recycling Draft Permit Language

Dear Ms. Graul,

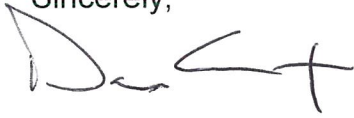
Concrete Nor'West (CNW) appreciates the opportunity to comment on the Concrete Recycling Draft Permit Language. Our comments are as follows:

1. The draft permit language is predicated on a data set that is statistically insignificant for the purpose of revising the existing permit. Violations compiled by Ecology represent less than 1% of the DMR's over a nearly 5 year period. A 99% permit compliance rate is a cause for celebration and the existing permit language should be retained. If it isn't broke don't fix it.
2. Requirements for Concrete Recycling BMP's for all are unnecessary. Facilities recycling concrete in compliance with the existing permit should not be burdened with additional requirements. BMP's should be suggested and used as a tool to regain compliance only when ongoing violations are documented.
3. Ecology has not presented any valid peer reviewed scientific data to support the suggested draft language. The University of Wisconsin study has not been peer reviewed and cannot be incorporated as a standard or benchmark in this permit update.
4. The 10- year, 24-hour storm event is the standard for compliance with the existing permit. We are aware that at least one company that reported pH values outside of permit limits did so after a storm event that was greater than the 10-year, 24-hour storm. Other violations may have been during the same timeframe. This information further dilutes the rational of using this data to revise the existing permit.
5. Concrete Recycle that is accessory to concrete batch plant operation should not be required to report under ECY002.
6. Please review appendix C to allow facilities that have entered the Pollution Prevention Schedule and resolved the issue to "reset". Identifying and

addressing high pH discharges satisfactorily should result in resuming normal operations and monitoring protocols under Table 1.

Thank you for your consideration of our comments, and please feel free to contact me with any questions at 360-757-3121.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Cox', with a stylized, cursive script.

Dan Cox

Environmental, Land Use & Safety Manager